



South Coast
Air Quality Management District
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August 11, 2016

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**Draft Mitigated Negative Declaration (DMND) for the
Proposed Vintage Lofts Residential Project**

The South Coast Air Quality Management District (SCAQMD) staff appreciates the opportunity to comment on the above-mentioned document. The following comments are meant as guidance for the Lead Agency and should be incorporated into the Final MND.

Project Description

In the project description, the Lead Agency proposes to demolish the 11 existing industrial-park buildings totaling 183,430 square feet¹ in order to subdivide the 6.81-acre lot into two parcels. Construction would then begin to build 148-residential condominium homes² along with ancillary uses (e.g., private driveways, parking, sidewalks, recreation uses, a clubhouse, walls and landscaping). Construction will occur in three phases over an approximately 25 month period starting in 2017 with occupancy starting in 2018.

Health Risk Assessment and Associated Mitigation

The Lead Agency notes that the proposed residences will be sited just north of the Interstate-5 Freeway, which has an average daily traffic volume of 324,000 vehicles that includes 19,030 diesel trucks.³ Because of the close proximity to the existing freeway, residents would be exposed to diesel particulate matter, which is a toxic air contaminant. As part of the Lead Agency's analyses, a health risk assessment was performed. That analysis determined that future residents would be exposed to cancer risk that would exceed the SCAQMD's recommended significance threshold of 10 in one million cases. To reduce the estimated risk to a less than significant level, the Lead Agency mitigation including a heating, ventilation, and air

¹ DMND, Appendix B: AQ & GHG Analyses, CalEEMod output sheets used 175,500 square feet for demolition.

² *Ibid*, Page 15 and CalEEMod output sheet, Land Use Size.

³ <http://www.dot.ca.gov/trafficops/census/> Caltrans 2014 Traffic Volumes on California Highways, Back Peak Month (The peak month ADT is the average daily traffic for the month of heaviest traffic flow. This data is obtained because on many routes, high traffic volumes which occur during a certain season of the year are more representative of traffic conditions than the annual ADT) for I-5 at Newport Avenue and 2014 Daily Truck Traffic percentage (5.5%) for Tustin/Junction Rte. 55.

conditioning (HVAC) air filtration system for each residential unit. The air filtration system will have a Minimum Efficiency Reporting Value (MERV) of 13 or higher. These and other support actions⁴ will also be part of the development's Covenant, Codes & Restrictions (CC&Rs). Based on the proposed mitigation, the project's cancer risk was estimated to be less than significant.

Limits to Enhanced Filtration Units

The Lead Agency should consider the limitations of the proposed mitigation for this project (enhanced filtration) on housing residents. For example, because the filters would not have any effectiveness unless the HVAC system is running, there may be increased energy costs to the resident. The proposed mitigation also assumes that the filters operate 100 percent of the time while residents are indoors. These filters also have no ability to filter out any toxic gases from vehicle exhaust. The presumed effectiveness and feasibility of this mitigation should therefore be evaluated in more detail prior to assuming that it will sufficiently alleviate near roadway exposures.

Compliance With SCAQMD Rules

Finally, the project includes demolition and soil disturbance activities that could fall under the following SCAQMD rules: Rule 1403 – Asbestos Emissions from Demolition/Renovation Activities would apply if asbestos is found during demolition, and Rule 1166 – Volatile Organic Compound Emissions from Decontamination of Soil would apply if soils containing Volatile Organic Compounds (VOCs) are encountered during soil disturbance activities. If applicable, compliance with these rules should be included in the Final MND.

Please provide the SCAQMD with written responses to all comments contained herein prior to the adoption of the Final MND. The SCAQMD staff is available to work with the Lead Agency to address these issues and any other air quality questions that may arise. Please contact Gordon Mize, Air Quality Specialist – CEQA Section, at (909) 396-3302, if you have any questions regarding these comments.

Sincerely,

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ORC160802-05
Control Number

⁴ Support Actions Described in the Draft IS/MND on Page 38.